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 Wayans Bros. Productions, and
 St. Martin's Press, Inc. (now known as
 SMP (1952) Inc.)

**UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA**

JARED EDWARDS,

Plaintiff

vs.

KEENEN IVORY WAYANS,
 SHAWN WAYANS, MARLON
 WAYANS, WAYANS BROTHERS
 PRODUCTIONS, AND ST.
 MARTIN'S PRESS, INC.,

Defendants.

CASE NO. 2:10-cv-02231 R (RCX)

**DECLARATION OF
 SEPTEMBER REA IN SUPPORT
 OF JOINT MOTION FOR
 SUMMARY JUDGMENT**

Date: January 18, 2011

Time: 10:00 a.m.

Location.: Courtroom 8

[Filed Concurrently With Notice of
 Motion and Joint Motion for
 Summary Judgment, Statement of
 Uncontroverted Facts and
 Conclusions of Law; Declarations of
 Jay S. Glick, Paul S. Sleven, and
 Elizabeth Beier; Joint Request for
 Judicial Notice and [Proposed] Order
 Granting Summary Judgment]

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1 I, September Rea, declare as follows:

2 1. I am an attorney with the law firm of Freedman & Taitelman, LLP,
3 attorneys of record for Keenen Ivory Wayans, Shawn Wayans, Marlon Wayans,
4 Wayans Bros. Productions, Inc. and St. Martin's Press, LLC (improperly named as
5 St. Martin's Press, Inc. (now known as SMP (1952) Inc.), defendants in the case
6 entitled *Jared Edwards v. Keenen Ivory Wayans, et al.*, Case No. 2:10-cv-02231 R
7 (RCX), In the United States District Court for the Central District of California
8 (the "Action") and as a result, I have personal knowledge of each matter stated
9 herein.

10 2. I am familiar with the published book entitled "101 Ways to Know
11 You're a Golddigger," (ISBN-13: 978-0-312-35969-0 ISBN-10:0-312-35969-1),
12 ("Golddigger") that is the subject of this Action and have reviewed the same. A
13 true and correct black-and-white copy of *Golddigger*, which was produced by
14 Plaintiff Jared Edwards in this Action and identified by Bates numbers JE_010
15 through JE_113, is attached hereto as **Exhibit "A"** and incorporated herein by
16 reference.

17 3. On November 23, 2010, I took the deposition of Jared Edwards, the
18 plaintiff in this Action, in Los Angeles, California. Jared Edwards's testimony was
19 stenographically recorded in accordance with the Federal Rules of Civil
20 Procedures and a transcript of the same was created by the court reporter. A true
21 and correct copy sections of the deposition of Jared Edwards is attached hereto as
22 **Exhibit "B"** and incorporated by reference.

23 4. As counsel of record, I have reviewed the Court's docket and
24 documents filed in connection with the pleadings and motions on file in this case.
25 Keenen Ivory Wayans signed a declaration in support of the Motion to Transfer
26 Pursuant to U.S.C. § 1404(a) that was filed in this Action in the United States
27 District Court for the Southern District of New York. A true and correct copy of
28 the Declaration of Keenen Ivory Wayans is attached hereto as **Exhibit "C"** and

1 incorporated by reference.

2 5. As counsel of record, I have reviewed the Court's docket and
3 documents filed in connection with the pleadings and motions on file in this case.
4 Marlon Wayans signed a declaration in support of the Motion to Transfer Pursuant
5 to U.S.C. § 1404(a) that was filed in this Action in the United States District Court
6 for the Southern District of New York. A true and correct copy of the Declaration
7 of Marlon Wayans is attached hereto as **Exhibit "D"** and incorporated by
8 reference.

9 I declare under penalty of perjury that the foregoing is true and correct.
10 Executed within the United States on December 17th, 2010.

11
12 /s/
13 September Rea, Esq.